

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTHERN DIVISION**

Kathleen Bliss, on behalf of herself, the Proposed Nationwide Rule 23 Class, and the Proposed Nevada Subclass,

Case No. 2:18-CV-01280-JAD-EJY

Plaintiff,

V.

CoreCivic, Inc.,

Defendant.

**STIPULATION TO EXTEND
DEADLINES
(Third Request)**

The parties respectfully request that the Court adopt the modifications to the scheduling order set forth below with respect to Defendant's class certification expert disclosures and both parties' class certification briefing:

1. Deadline for Defendant's class certification expert disclosures extended from October 14, 2022, until February 17, 2023.

2. Class certification briefing schedule modified as proposed in the table below:

<u>Filing</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Plaintiff's opening class certification brief	December 19, 2022	March 31, 2023
Defendant's class certification response brief	January 2, 2023 (14 days after the opening brief is filed)	May 1, 2023 (30 days after the opening brief is filed)
Plaintiff's class certification reply brief	January 9, 2023 (7 days after the response brief is filed)	May 31, 2023 (30 days after the response brief is filed)

This is the third request to extend time to file Defendant's class certification expert disclosures and the parties' class certification briefs. (See ECF Nos. 86 and 155 (the parties' previous requests).) The existing schedule has been in place since October 4, 2021. (ECF No. 156.) Since that time, the parties made significant progress on discovery necessary for class certification.

1 and reached a stipulation regarding Defendant's use of certain non-ESI documents to argue against
 2 class certification. (ECF No. 215.) Accordingly, the primary outstanding discovery that is relevant
 3 to class certification is from third-party telephone vendors and state bar associations, and from
 4 recently disclosed witnesses. The parties make this request because of issues that have arisen with
 5 the aforementioned third-party discovery (including issues related to data production and
 6 deposition scheduling conflicts), Plaintiff's desire to take depositions of certain of Defendant's
 7 recently disclosed witnesses, and ongoing work through the agreed upon ESI protocol.

8 Date: October 14, 2022

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15 **IT IS SO ORDERED:**

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17 UNITED STATES MAGISTRATE JUDGE

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19 DATED: October 17, 2022

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